

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

IN RE:

PROJECT VERTE INC.,

Debtor.

ALFRED T. GIULIANO, as Trustee for Project
Verte Inc.,

Plaintiff,

V.

JULIAN KAHLON and GRAHAM FORTGANG,

Defendants.

Chapter 7

Case No. 23-0101-LSS

Adv. Proc. No. 23-50459-LSS

DECLARATION OF LEONARD WEINTRAUB

LEONARD WEINTRAUB declares, under penalty of perjury, as follows:

1. I am admitted to practice law before the courts of the State of New York and am a Partner with the law firm of Paduano & Weintraub LLP, co-counsel for Defendants Julian Kahlon and Graham Fortgang (collectively “Defendants”).

2. I submit this Declaration in support of Defendants' Motion to Dismiss the Amended Complaint.

3. A true and correct copy of the First Amended Complaint in this action, dated November 1, 2023 [D.E. 29], is attached hereto as Exhibit A.

4. A true and correct copy of the Opinion & Order on Cross-Motions for Summary Judgment, dated March 23, 2022, in the matter captioned Kahlon v. Project Verte, Inc., No. 20-cv-3774 (S.D.N.Y.), is attached hereto as Exhibit B.

5. A true and correct copy of the email sent by Graham Fortgang to Sara Rubenstein with copy to Jane Gol, Julian Kahlon and Yafit Lev-Aretz on July 19, 2022 at 12:20 AM, without attachments, is attached hereto as Exhibit C.

6. A true and correct copy of the Motion for an Entry of an Order Directing Turnover of Real Estate Property, dated February 24, 2023, filed in In re Project Verte Inc., U.S. Bankruptcy Court for the District of Delaware (Case No. 23-10101-LSS) [D.E. 30], is attached hereto, without exhibits, as Exhibit D.

7. A true and correct copy of Project Verte Inc.'s Amended and Restated Certificate of Incorporation, dated June 17, 2019, is attached hereto as Exhibit E.

Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 30, 2023.


Leonard Weintraub